# Periodic Monitoring Plan Instruction Rawhide Energy Station

APPROVED BY:		DATE:	November	30,	2000

#### Purpose:

To provide a uniform procedure for periodically evaluating, documenting, and reporting the compliance status of the permitted air pollution emission sources.

This instruction is applicable to all permitted air pollution sources at Rawhide.

### Overview:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

Continuous Emissions/Opacity Monitoring Systems: The main stack is instrumented with a continuous emissions monitoring system (CEMS) and a continuous opacity monitor (COM) which are used to monitor and document our compliance with applicable emission limits. The Control System Operating Report is used to demonstrate and document normal operation during periods when the CEMS or COM is unavailable. EPA Reference Method 9 visual observations may need to be periodically performed when the COM is not providing quality assured data, and when there is reason to believe that the baghouses are not operating normally and there are visible emissions. During these situations, an EPA Reference Method 9 visual observation will be performed at least twice per day when visible emissions are believed to be greater than 10 percent opacity. If any of the EPA reference Method 9 opacity observations exceed 20 percent then additional observations will be performed until two consecutive observations are less than 20 percent.

# Instruction:

Plant equipment and associated emissions control equipment operation and monitoring is a 24-hour a day, 7-day a week activity. The Periodic Monitoring (PM) Report is used to record and certify the compliance status for the various permitted emission units. The PM Report is the primary data source and verification record for compiling the quarterly and annual emission monitoring compliance certification statements.

The responsibilities for assuring that a PM report is properly completed, reviewed, filed, and reported are defined below:

# 1. Fuel Handling Supervisor:

The Fuel Handling Supervisor and other Operation's staff are responsible for routine plant equipment monitoring, investigating equipment malfunctions, and contacting maintenance for required repairs. In addition to supervising the

routine plant equipment monitoring and the repair coordination activities (Work Request Procedures), the Fuel Handling Supervisor will evaluate emissions control equipment malfunctions for possible environmental impacts and compliance with applicable operating permit conditions.

During normal workdays the Fuel Handling Supervisor will periodically assess the compliance status of the various emission units which are associated with this work area. Before the end of each normal work day, and after obtaining input from key staff, the Fuel Handling Supervisor will complete a PM Report and forward(electronically transfer)the signed original to the Environmental Specialist for filing. The Fuel Handling Supervisor will also forward copies of the PM Report to the Plant Manager, Plant Maintenance Manager, and Plant Operations Manager if there has been any status assessments which indicate an out of compliance situation.

The Fuel Handling Supervisor will maintain an EPA Method 9 Visible Determination of Opacity Emissions Certification in order to make the required opacity emission evaluations and PM certifications.

The Fuel Handling Supervisor will notify the Plant Operations Manager when coverage is required due to scheduled leave and other planned absences away from the Plant.

## 2. Shift Supervisors:

During the course of normal work days the Shift Supervisor on duty will periodically assess the compliance status of the plant's emission units. The Shift Supervisors will report abnormal operating conditions, which may effect the compliance status of any of the plant's emission units, to the Fuel Handling Supervisor so that this condition can be properly investigated and the compliance assessment can be properly entered onto the PM Report.

The Shift Supervisors are responsible for routine plant equipment monitoring, investigating equipment malfunctions, and initiating repairs. In addition to supervising the routine plant equipment monitoring and the repair coordination activities, the Shift Supervisors will evaluate emissions control equipment malfunctions for possible environmental impacts and compliance with applicable operating permit conditions.

If an emission unit is emitting significant visible emissions a Shift Supervisor will contact either the Fuel Handling Supervisor or the Environmental Specialist, or other EPA Method 9 certified staff who will evaluate the emissions for compliance.

Shift Supervisors will periodically (at least once every 5 years) obtain EPA Method 9 Visible Determination of Opacity Emissions Certification in order to make the required opacity emission evaluations.

At times when the Fuel Handling Supervisor is absent, the Shift Supervisor will be responsible for obtaining the required information, completing a PM Report and forwarding it to the Environmental Specialist, Plant Manager, Plant Operations Manager, and Plant Maintenance Manager.

# 3. Plant Operations Manager:

The Plant Operations Manager will coordinate PM reporting coverage by the Shift Supervisors during periods when the Fuel Handling Supervisor is unavailable.

### 4. Plant Maintenance Manager:

The Plant Maintenance Manager will periodically assess the operating status of the emissions control equipment. The Plant Maintenance Manager will contact the Fuel Handling Supervisor to report any abnormal operating emission units so that these situations are investigated and this information is properly entered in the PM Report.

### 5. Environmental Specialist:

The Environmental Specialist is responsible for reviewing the PM reports for completeness and filing the signed originals. The Environmental Specialist is responsible for compiling and summarizing the submitted PM Reports. If required, the Environmental Specialist will also perform any required "Upset Condition" notifications and reporting.

The Environmental Specialist will maintain an EPA Method 9 Visible Determination of Opacity Emissions Certification in order to assist with the periodic opacity emission evaluations and certifications. The Environmental Specialist will evaluate emissions control equipment malfunctions for possible environmental impacts and compliance with applicable operating permit conditions.

The Environmental Specialist will report any observed periods of abnormal emission control equipment operation to Operations for timely investigation and repair coordination. Abnormal emissions control equipment operation and any detected non-compliance conditions will also be reported to the Fuel Handling Supervisor so that this information can be properly entered on the PM Report.

## 6. Designated and Alternate Representative:

Platte River's Designated Representative (DR) is responsible for signing and submitting the quarterly compliance certification statements and emission monitoring report. In the absence of the Designated Representative the Alternate DR is responsible for fulfilling this reporting requirement.

